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U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF
NEW YORK

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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

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In re:

BRIAN H. DENKER-YOUNGS

Chapter 7

Debtor

Case Number 15-41069

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**NOTICE OF MOTION IN SUPPORT OF AN ORDER CLARIFYING 11 U.S.C. § 362 IN
RE: MATRIMONIAL PROCEEDINGS BEFORE THE STATE AND FURTHER
GRANTING DEBTOR APPLICATION FOR A 2004 APPLICATION
[ECF doc 71]**

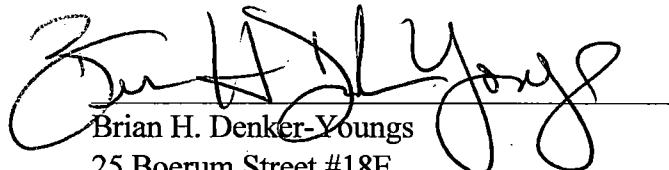
PLEASE TAKE NOTICE that upon the attached affidavit of the debtor, Brian H. Denker-Youngs, sworn to this 4th day of December 2015, and the exhibits attached thereto, and upon all prior pleadings and proceedings, herein, the debtor will move the honorable court on the 13th day of January 2016 before the Honorable Chief Justice Carla E. Craig at the United States Bankruptcy Court, Eastern District of New York at 271-C Cadman Plaza East, Brooklyn NY 11201 at 10:00 in the morning or as soon thereafter as parties may be heard for an Order:

1. Clarifying for the State Supreme Court that Discovery of the non-debtor spouse is exempt and not stayed pursuant to 11 USC 362 and should proceed independent of relief from stay for equitable distribution
2. Granting debtors motion for a 2004 Application and Examination of the non-debtor spouse and named parties via special counsel to the debtor

3. Further continuing stay relief for equitable distribution until such matters of debt obligations and assignments are determined by debtor's requested financial audit pursuant to State Supreme Court Order to Show Cause dated November 4, 2014.
4. Any and other such further reliefs the courts deem just and proper.

Objections in writing to this application should be submitted via the electronic filing system with service to the debtor, Trustee Richard McCord, the United States Trustee and copy to the Chambers of the Honorable Chief Justice Carla E. Craig on or before 4:30pm on the 23rd day of December 2015. Parties who wish to be heard are to appear on the matter during a hearing set-down for the 13th day of January 2016 at 10:00am.

Date: December 4, 2015


Brian H. Denker-Youngs
25 Boerum Street #18E
Brooklyn, NY 11206